

U.S. Department of Justice

Washington, DC 20530

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Short Form Registration Statement

## Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS. Each partner, officer, director, associate, employee, and agent of a registrant is required to file a short form registration statement unless he engages in no activities in furtherance of the interests of the registrant's foreign principal or unless the services he renders to the registrant are in a secretarial, clerical, or in a related or similar capacity. Compliance is accomplished by filing an electronic short form registration statement at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .23 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name Rachel Strickland	2. Registration Number 6957
3. Residence Address Provided under separate cover to the Department of Justice.	4. Primary Business Address 787 Seventh Avenue New York, NY 10019
5. Year of Birth 1974  Nationality USA  Present Citizenship USA	6. If present citizenship was not acquired by birth, indicate when, and how acquired.
7. Occupation Attorney	

8. What is the name and address of the primary registrant?	
Name Willkie Farr & Gallagher LLP	Address 787 Seventh Avenue New York, NY 10019

9. (a) Indicate your connection with the primary registrant:

<input checked="" type="checkbox"/> partner	<input type="checkbox"/> director	<input type="checkbox"/> employee	<input type="checkbox"/> consultant
<input type="checkbox"/> officer	<input type="checkbox"/> associate	<input type="checkbox"/> agent	<input type="checkbox"/> subcontractor
<input type="checkbox"/> other (specify) _____			

(b) Specify your position/title: Partner

10. List the foreign principal to whom you will render services in support of the primary registrant.

The Foreign Principal is the Ad Hoc Board of Petróleos de Venezuela, S.A. (or, "PDVSA Ad Hoc Board"), which directly or indirectly owns PDV Holding Inc. ("PDVH"), CITGO Holding, Inc., ("CITGOH") and CITGO Petroleum Corporation ("CPC"), the entities for which registrant acts as legal counsel.

11. Describe in detail all services which you will render to the foreign principal listed in Item 10 either directly, or through the primary registrant listed in Item 8.

Acting on behalf of the U.S.-based CITGO entities, sometimes collectively and other times separately, the registrant engaged with representatives of the U.S. Government to discuss how a contemplated default by the Maduro regime on the so-called PDVSA 2020 bonds would harm the interests of the CITGO entities, and to urge the U.S. Government to take steps to protect the CITGO entities from those harms. This included discussions of the need to reform, suspend, or repeal General License 5. In making these arguments, the registrant explained how modifying or repealing General License 5 would promote the policy objectives of the U.S. sanctions regime. For more information on the details of these activities, please see the index of communications filed as an attachment to the short-form registration statements.

12. Do any of the above described services include political activity as defined in Section 1(o) of the Act<sup>1</sup>

Yes ☒ No ☐

If yes, describe separately and in detail such political activity. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation or dissemination of informational materials.

Please see the index of communications filed as an attachment to this short-form registration statement.

13. The services described in Items 11 and 12 are to be rendered on a

☐ full time basis ☐ part time basis ☒ special basis

14. What compensation or thing of value have you received to date or will you receive for the above services?

☐ Salary: Amount \$ \_\_\_\_\_ per \_\_\_\_\_ ☐ Commission at \_\_\_\_\_ % of \_\_\_\_\_

☒ Salary: Not based solely on services rendered to the foreign principal(s).

☐ Fee: Amount \$ \_\_\_\_\_ ☐ Other thing of value \_\_\_\_\_

15. During the period beginning 60 days prior to the date of your obligation to register under FARA, have you, from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to political office or in connection with any primary election, convention, or caucus held to select candidates for any political office?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
N/A				

## EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

4/30/2021

Rachel Strickland

/s/ Rachel Strickland

Date

Printed Name

Signature

<sup>1</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Date	Contacts	Method	Purpose	Willkie Farr & Gallagher Participants
6/10/19	Joshua Goodman, Associated Press	Call	Regarding detainees and regulatory challenges	Michael Gottlieb
6/11/19	Meeting with Staff, Sen. Marco Rubio	Meeting	Regarding detainees and regulatory challenges	Michael Gottlieb
6/11/19	Meeting with Staff, Sen. John Cornyn	Meeting	Regarding detainees and regulatory challenges	Michael Gottlieb
8/28/19	Adam Lerner, Department of Treasury	Email	Request from OFAC to discuss license amendments	Michael Gottlieb
8/28/19	Adam Lerner, Department of Treasury	Meeting	Regarding CPC operations and concerns relating to PDVSA default	Michael Gottlieb; Rachel Strickland
8/28/19	Adam Lerner, Department of Treasury	Email	Request for analysis on CPC and CITGO H issues relating to PDVSA default	Michael Gottlieb; Rachel Strickland
8/29/19	U.S. Department of Commerce - Secretary Wilbur Ross; Earl Comstock	Meeting	Regarding PDVH, CITGO H, and CPC operations, corporate structure, and concerns relating to PDVSA default	Michael Gottlieb
8/29/19	U.S. Department of Energy: Steven Winberg, Assistant Secretary, Fossil Energy Mark Maddox, Principal Deputy Assistant Secretary, Fossil Energy Shawn Bennett, Deputy Assistant Secretary, Oil and Natural Gas Matthew Cline Director, Office of American Affairs Elizabeth Urbanas, Deputy Assistant Secretary, Asia and the Americas - Office of International Affairs Michael Tadeo, Senior Advisor to Steven Winberg	Meeting	Regarding PDVH, CITGO H, and CPC operations, governance, and concerns relating to PDVSA default	Michael Gottlieb
9/11/19	Adam Lerner, Department of Treasury	Call	Message regarding potential call	Michael Gottlieb
9/11/19	Sen. Bill Cassidy	Meeting	Regarding detainees; General License 5	Michael Gottlieb
9/11/19	Rep. Clay Higgins	Meeting	Regarding detainees; General License 5	Michael Gottlieb
9/11/19	Michael Needham (Chief of Staff) and Viviana Bovo for Sen. Marco Rubio	Meeting	Regarding detainees; General License 5	Michael Gottlieb
9/11/19	Brian Skretny, Legislative Director and Senior Advisor, Harry Semerdjian, House Foreign Affairs Committee, Eric Jacobstein, Alex Sadler	Meeting	Regarding General License 5	Michael Gottlieb
9/12/19	Sen. Ted Cruz	Meeting	Regarding detainees; General License 5	Michael Gottlieb
9/18/19	Vera Bergengruen, TIME	Call	Regarding detainees; General License 5	Michael Gottlieb
9/23/19	Vera Bergengruen, TIME	Call	Regarding detainees; General License 5	Michael Gottlieb
9/24/19	Adam Lerner, Department of Treasury	Meeting	Meeting at the request of Treasury	Michael Gottlieb
9/25/19	Adam Lerner, Department of Treasury	Email	Questions from Treasury regarding PDVSA 9% notes	Michael Gottlieb
9/27/19	Adam Lerner, Department of Treasury	Call	Update call	Michael Gottlieb
9/30/19	Andrew Scurreia, Wall Street Journal	Call	Regarding risk of PDVSA default and General License 5	Michael Gottlieb
9/30/19	Adam Lerner, Department of Treasury	Email	Questions from Treasury regarding CPC debts	Michael Gottlieb
10/1/19	Adam Lerner, Department of Treasury	Call/Email	Regarding General License 5	Michael Gottlieb
10/2/19	Eric Jacobstein	Email	Regarding follow-up information	Michael Gottlieb
10/3/19	Adam Lerner, Department of Treasury	Email	Regarding Crystallex litigation	Michael Gottlieb
10/4/19	Joseph U Bottari, White House Associate Director; Francis J Brooke, Special Assistant to the President for Economic Policy	Meeting	Meeting to discuss operational and regulatory challenges faced by PDVH, CITGOH, and CPC including threat of PDVSA default.	Michael Gottlieb
10/10/19	Mary O'Grady, Wall Street Journal	Call	Regarding risk of PDVSA default and General License 5	Michael Gottlieb
10/11/19	Sergio Chapa, Houston Chronicle	Call	Regarding risk of PDVSA default and General License 5	Michael Gottlieb
10/14/19	Adam Zuwanich, The Leader and Fort Bend Star	Call	Regarding detainees; risk of PDVSA default and General License 5	Michael Gottlieb
10/21/19 - 10/24/19	Adam Lerner, Department of Treasury	Multiple phone calls	Discussion of developments and status related to General License 5	Michael Gottlieb
10/29/19	Adam Lerner, Department of Treasury	Email	Meeting request	Michael Gottlieb